

Memo

To: National Organic Standards Board (NOSB)
From: Dan Leitman, President – Crystal Creek, Inc.
CC:
Date: 9/15/02
Re: Points to consider when making decisions on TAP reviewed ingredients.

Potassium Sorbate (PS) for use in aloe vera products:

The petition request is for the use of potassium sorbate as a mold inhibitor in aloe vera products.

- 1) "PS is widely used in the food industry and few substances have had the kind of extensive, rigorous, long-term testing that sorbic acid and its salts have had. It has been found to be non-toxic, even when taken in large quantities and breaks down in the body into water and carbon dioxide in the Kreb's Cycle"¹ PS is a naturally occurring unsaturated fatty acid and is completely safe with regard to health and have the lowest allergenic potential of all food preservatives."² ^{1,2} Directly referenced from http://www.ferlowbrothers.com/potassium_sorbate.htm
- 2) This is not a petition for all preservatives but rather for one preservative that has a very specific and important use.
- 3) PS sets a very high standard for any other preservative to attain.
- 4) The TAP reviews agree that there is no concern with the use of PS other than the fact it falls into a classification of being a preservative.
- 5) There are many other examples of mold inhibiting compounds that are very safe and common in organic use, i.e. sodium chloride (table salt), vinegar. These also are preservatives and can be found in natural form.
- 6) PS can be found in natural form also (mountain ash berries), but is not realistically available for commercial use, so a synthetic form is made to provide the volumes needed.
- 7) Other synthetics that are known to be safe are allowed when a natural form is not realistically available, i.e. vitamins, minerals.
- 8) **PS an excipient** (Any substance added to a medicine so that it can be formed into the proper shape and consistency; the vehicle for the drug. In this case a natural drug or nutraceutical) **essential to delivery of aloe vera for therapeutic applications.**
- 9) PS is essential for the delivery of **safe and clean** aloe vera products for therapeutic application to both human and livestock needs.

- 10) Recommend the allowance of PS to be used in aloe vera products for both human and livestock applications based on its international recognition as a safe ingredient and its important contribution for the delivery of safe, clean and naturally therapeutic aloe vera. Resist declining this request just because PS could be classified as a preservative – consider the facts and judge on merit.

Other Safe Compounds Critical To Allow For Organic Use:

Calcium Propionate: Dietary supplement and treatment of milk fever and ketosis.

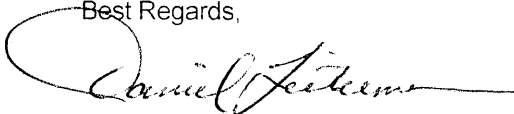
Yeast Derivatives (YD): Dietary supplement to treat dysentery and pathogenic toxemia.

Proteinates Chelates: Immune support for stressed and sick livestock.

Cell Wall Carbohydrates: Dietary supplement, derived from yeast cells to treat mycotoxin toxemia.

Thank you for your dedicated consideration. Please let me know if I can help your decision process in any way.

Best Regards,

A handwritten signature in black ink, appearing to read "Dan Leiterman", with a large, stylized loop at the beginning.

Dan Leiterman
President, Crystal Creek, Inc.